



OAKLAND COUNTY DEMOCRATIC PARTY

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February 24th, 2016

Re: RR 16L-02

CELA

Dear Mr. Jordan,

This is the response of Philip W. Reid, Treasurer, and the Oakland County Democratic Party to your letter dated January 28, 2016 concerning the above matter. We urge that no action be taken for these reasons.

1. Why the February, March and April, 2015 Reports Were Amended.

This was a period of significant change for the ODCP in its operations.

First, beginning in September, 2014 ODCP acquired four (4) new bingo fundraising licenses from the State of Michigan, increasing the number of ODCP weekly bingo's from two (2) to six (6). This significantly increased the sums required to be reported.

Second, beginning in February 2015, ODCP transitioned from a reporting procedure where the Treasurer prepared and filed FEC reports and the Bookkeeper entered transactional data into Quickbooks to a new process where the Bookkeeper processed Quickbooks data directly into FEC reports using NGP.

Third, the ODCP Treasurer had been informed by the FEC Reports Analyst that there were serious problems with reports that had been filed by the Committee in 2014. ODCP determined that it needed to go back to the beginning of 2013 to resolve known report issues. This period of FEC reports spanned two previous Treasurers and two previous Bookkeepers. Future reports would inherit the problems created in previous reports.

In the course of all these operational changes and massive correction of previous reports, the inadvertent underreporting of the disbursements at issue took place. When it was discovered, it was promptly corrected.

2. The Failure to Report and Subsequent Amendments Had No Effect on Federal Election Activity.

The disbursements in question had no effect on federal election activity in 2015 for several reasons. First, the bulk of the disbursements was the prize money paid to individual players at our bingo games. Second, there were no federal elections during this period so the balance of the disbursements paid for ODCP administrative costs such as an office. Thus, the public was not deprived of being able to consider the impact of these disbursements on federal elections.

3. These Reporting Errors Will Not Occur Again.

The problems in transferring data from Quickbooks to NGP have been resolved and will not occur again. ODCP has reviewed all of its recordkeeping and reporting practices to ensure that this inadvertent error will not reoccur.

Conclusion

These errors were the inadvertent product of massive changes in ODCP operations. There was no intentional underreporting and when the underreporting was discovered it was promptly corrected. Moreover, the initially unreported disbursements at issue had no impact whatsoever on federal election activity and therefore did not harm the public. Finally, changes have been made to ensure that these errors will not reoccur.

For these reasons, ODCP requests that no action be taken in this matter.

Sincerely,

Phillip Reid, Treasurer

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CELA

Statement of Designation of Counsel

Provide one form for each Respondent/Witness
FAX 202-219-3923

CASE #: RR 16L-02

Name of Counsel: MARK BREWER

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The above-named individual and/or firm is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

2-24-16
Date

Philip W. Neil
Signature

TREASURER
Title

RESPONDENT: OAKLAND COUNTY DEMOCRATIC PARTY
(Committee Name/Company Name/Individual Named In Notification Letter)

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